PERMIT No. 2421-095-0117-P-01-0
ISSUANCE DATE:

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name:	**Albany Lumber**
Facility Address:	**3194 Sylvester Road** **Albany, Georgia 31705 (Dougherty County)**
Mailing Address:	**133 Peachtree Street NE** **Atlanta, Georgia 30303**
Facility AIRS Number:	**04-13-095-00117**

is issued a Permit for the following:

Construction and operation of a lumber mill with three direct-fired continuous drying kilns with natural gas burners, a sawmill, a planer mill, an emergency fire pump diesel engine and storage tanks for diesel and gasoline.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 26682 dated August 21, 2018; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **11** pages.

STATE OF GEORGIA
CONSTITUTION
WISDOM JUSTICE MODERATION
1776

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Richard E. Dunn, Director
Environmental Protection Division

1. General Requirements

1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.

1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.

1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.

1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.

1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

2.1 The Permittee shall not dry more than a combined total of 360 million board feet of lumber from the drying kilns CDK1, CDK2 and CDK3 during any twelve consecutive months. If required, the VOC emissions from the continuous kilns CDK1, CDK2 and CDK3 shall be estimated using a VOC emission factor of 4.28 lb/MBf (as Carbon). This limit shall apply during all operating conditions.
[PSD/BACT, 40 CFR 52.21]

2.2 Total organic compound (TOC) emissions from the diesel emergency fire pump engine shall not exceed 0.00251 lb/hp-hr. This limit shall apply during all operating conditions.
[PSD/BACT limit, 40 CFR 52.21, 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ]

2.3 The gasoline tank shall use submerged fill bottom loading and light tank color for minimizing VOC emissions.
[PSD/BACT limit, 40 CFR 52.21]

2.4 The Permittee shall construct and operate the sources described in the PSD permit Application No. 26682 that is subject to Georgia Rule 391-3-1-.02(7) in accordance with the application submitted pursuant to that rule. If the Permittee constructs or operates a source or modification not in accordance with the application submitted pursuant to that rule or with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement action.
[40 CFR 52.21(r)(1)]

2.5 Approval to construct sources defined in PSD permit Application No. 26682 shall become invalid if construction of the Albany Lumber mill is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more or if construction is not completed within a reasonable time. The Director may extend the 18-month period upon a satisfactory showing that an extension is justified. For purposes of this Permit, the definition of "commence" is given in 40 CFR 52.21(b)(9).
[40 CFR 52.21(r)(2)]

2.6 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63, in Subpart A – "General Provisions." and Subpart DDDD – "National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products" for the operation of the direct-fired continuous drying kilns (CDK1, CDK2 and CDK3).
[40 CFR 63 Subpart A and DDDD]

2.7 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart IIII - " Standards of Performance for Stationary Compression Ignition Internal Combustion Engines," for operation of the emergency fire pump engine (FE).
[40 CFR 60.4200]

2.8 The Permittee shall comply with emission standards for NMHC+NOx and PM as follows during the useful life of the emergency fire pump engine (FE):
[40 CFR 60.4205(c)]

	g/kW-hr (g/HP-hr)		
Pollutant	$NMHC+NO_X$	CO	PM
Emission Limit	4.0 (3.0)	-	0.20 (0.15)

2.9 The Permittee shall only use diesel fuel that has a maximum sulfur content of 15 ppm (0.0015 percent by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent.
[40 CFR 60.4207, 40 CFR 80.510(b) and 391-3-1-.02(2)(g)2 (subsumed)]

2.10 The accumulated non-emergency service (maintenance check, readiness testing and other non-emergency use) time for the emergency fire pump engine (FE) shall not exceed 100 hours per year including 50 hours for non-emergency use.
[40 CFR 60.4211(e) and (f)]

2.11 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ – "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and the applicable provisions of Subpart A, "General Provisions" as defined in Table 8 to Subpart ZZZZ to Part 63 for operation of the emergency fire pump engine (FE).
[40 CFR 63.6605 and Table 8 to 40 CFR 63 Subpart ZZZZ]

2.12 The Permittee shall operate and maintain the emergency fire pump engine (FE), in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown, and malfunction.
[40 CFR 63.6605(b)]

2.13 The Permittee shall not discharge or cause the discharge, into the atmosphere, from the drying kilns (CDK1, CDK2 and CDK3), planer mill (PM), sawdust fuel silos and the emergency fire pump engine (FE) any gases which exhibit visible emissions, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]

2.14 The Permittee shall not discharge or cause the discharge into the atmosphere from the drying kilns (CDK1, CDK2 and CDK3), sawmill (SM), planer mill (PM), sawdust fuel silo, particulate emissions in excess of the rate derived from:
[391-3-1-.02(2)(e)1.(i)]

$E = 4.1 * P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

$E = 55 * P^{0.11} – 40$; for process input weight rate above 30 tons per hour.

where P equals process input weight rate in tons per hour and E equals the allowable emission rate in pounds per hour.

2.15 The Permittee shall burn natural gas only in the drying kiln burners (CDK1, CDK2 and CDK3) unless otherwise specified by the Director.
[391-3-1-.02(2)(g)2, PSD avoidance for PM]

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from fugitive dust sources at the facility. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following: [391-3-1-.02(2)(n)1]

a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;

c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;

d. Covering, at all times when in motion, open bodied trucks, transporting materials likely to give rise to airborne dusts; and

e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

3.2 The percent opacity from any fugitive dust source shall not equal or exceed twenty percent. [391-3-1-.02(2)(n)2]

4. Process & Control Equipment

4.1 For each week or portion of each week of operation of the planer mill (PM) inspect the exterior of the cyclofilter (PMC) for holes in the body or evidence of malfunction in the interior of the cyclofilter.

Any adverse condition identified by the weekly inspection of the cyclofilter that is not corrected within 48 hours shall be recorded, as an excursion, in a maintenance log, along with a description of the corrective action and when it was completed. These records shall be kept in a form suitable for inspection or submittal to the Division upon request.
[391-3-1-.02(6)(b)1]

4.2 Within 180 days of the startup of the direct-fired continuous Kilns CDK1, CDK2 and CDK3 the Permittee shall develop and implement a Work Practice and Preventive Maintenance Program (PMP) for the continuous drying Kilns to assure that the provisions of Condition 1.1 are met. The program shall be subject to review and modification by the Division.

At a minimum, the following operational and maintenance checks shall be made and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs:
[391-3-1-.02(6)(b)1 and 40 CFR 52.21]

a. General Work Practice Standards for Wood-Drying Kiln Operation:

i. The lumber kiln drying operation target final moisture content will be 12% or greater based on a 12-month rolling average. Moisture content will be measured with a moisture meter after the planer mill.

ii. Operate the lumber drying kilns (CDK1, CDK2 and CDK3**)** per the Preventive Maintenance Program (PMP) developed for the drying kilns and maintain records documenting compliance with this maintenance plan**.** With future equipment changes or modifications these preventative maintenance activities can be modified pending approval from EPD.

b. Daily Routine:

i. Make certain all fans are running properly. If one "trips out" frequently or becomes inoperable, investigate to determine the reason and then document the corrective actions.

ii. Check to verify that the kiln heating systems (gas-fired burners) are operating properly.

c. Six Week Routine:

i. Grease fan motors, shafts and bearings and inspect fan blades for damage. Check fan clearances, rotation, tension and replace belts if required.

ii. Inspect kiln walls, doors and baffles for deterioration and schedule repairs as needed.

iii. Inspect temperature monitoring systems for proper operation.

iv. Inspect vents and linkages. Schedule repairs as needed.

v. Grease vent shafts or vents in internal linkages.

vi. If necessary sweep out kiln to remove accumulated dust.

vii Inspect and repair as necessary external components of gas-fired burners.

d. Semi-annual Routine:

i. Verify accuracy of the temperature measurement systems. Repair or replace components as necessary.

ii. During cold shutdown of continuous kilns CDK1, CDK2 and CDK3 inspect and repair as necessary all internal components of kilns and gas-fired burners. During this time the continuous kilns CDK1, CDK2 and CDK3 and burners should be thoroughly cleaned of accumulated dust.

e. Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record problems discovered in a maintenance log/checklist or the plant's Computerized Maintenance Management System (CMMS), indicating the corrective action(s) taken.

If a problem discovered during daily inspection cannot be remedied within 48 hours of discovery, it shall be entered into the plant's Computerized Maintenance Management System (CMMS) as an excursion.

5. Monitoring

5.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1]

5.2 The Permittee shall install, calibrate, maintain and operate a system to continuously monitor and record the moisture content of the kiln dried lumber downstream of the planer mill.
[391-3-1-.02(6)(b)1]

5.3 The Permittee shall install, calibrate, maintain and operate a non-resettable hour meter for the emergency fire pump engine (FE) to monitor and record the hours of operation in non-emergency service (maintenance and/or testing and any non-emergency use) and to calculate the cumulative total hours of operation in non-emergency service (maintenance and/or testing) in any consecutive twelve months. The records shall document the reason for non-emergency use.
[40 CFR 60.4209(a)]

6. Performance Testing

6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:

a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.

b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

7. Notification, Reporting and Record Keeping Requirements

7.1 The Permittee shall submit written notification of startup of the continuous drying kilns to the Division within 15 days after such date. The notification shall be submitted to:
Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354
[40 CFR 63.9(b)(4)(v)]

7.2 Upon startup of continuous drying Kilns CDK1, CDK2 and CDK3, The Permittee shall report any 12-consecutive month combined total amount of lumber dried in all three drying kilns in excess of 360 million board feet.
[391-3-1-.02(6)(b)1]

7.3 The Permittee shall report anytime fuel oil with sulfur content greater than 0.0015 percent by weight (15 ppm) is fired in the emergency fire pump (FE).
[391-3-1-.02(6)(b)1 and 40 CFR 60.4207]

7.4 The Permittee shall report any adverse condition discovered by the weekly inspections of the Planer mill cyclofilter (PMC) that is not corrected within 48 hours.
[391-3-1-.02(6)(b)1]

7.5 The Permittee shall retain records of the quantity of natural gas burned monthly in the drying kiln burners or maintain monthly records of the amounts of natural gas delivered to the facility.
[391-3-1-.03(2)(c)]

7.6 The Permittee shall maintain monthly records of the combined total amount of dried lumber processed through the continuous drying Kilns CDK1, CDK2 and CDK3 necessary to confirm compliance with the drying limit in Condition 2.1. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request. These records shall be retained for at least five years following the day of record.
[391-3-1-.02(6)(b)1(i) and 40 CFR 52.21]

7.7 The Permittee shall calculate and record, each month the 12 consecutive month combined total amount of lumber dried in the continuous drying Kilns CDK1, CDK2 and CDK3 using the monthly records from Condition 7.6, necessary to confirm compliance with the drying limit in Condition 2.1. A 12-consecutive month total shall be defined as the sum of a current month's combined total for all three drying kilns plus the combined totals for all three drying kilns, for the previous eleven consecutive months.
[391-3-1-.02(6)(b)1 and 40 CFR 52.21

7.8 The Permittee shall submit a semiannual report of the 12-consecutive month combined total amount of the lumber dried (in million board feet) in all three continuous lumber drying Kilns by August 29 of the calendar year of record and by February 28 of the year following the calendar year of record, unless otherwise approved by the Division. The semiannual reporting periods shall be January 1 through June 30 and July 1 through December 31 each calendar year. The reports shall be submitted in a manner suitable to the Division and shall be prepared from records in Condition 7.7 and contain six 12-consecutive month combined total amount of lumber dried in all three continuous drying Kilns.
[391-3-1-.02(6)(b)1 and 40 CFR 52.21]

7.9 The Permittee shall notify the Division in writing if the combined total amount of lumber dried in all three continuous drying kilns exceeds 30 million board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the drying limit in Condition 2.1.
[391-3-1-.02(6)(b)1]

7.10 The Permittee shall demonstrate compliance with the emission limits specified in Condition 2.8 by purchasing an engine certified to comply with the emission standards in 60.4205(c), for the same model year and maximum engine power as the fire pump engine (FE). The engine must be installed and configured according to the manufacturer's specifications. These records shall be maintained in a format suitable for inspection or submittal to the Division upon request.
[40 CFR 60.4211(c)]

7.11 The Permittee shall maintain a copy of the manufacturer's written operating and maintenance instructions or operating and maintenance procedures developed by the Permittee that have been approved by the engine manufacturer. In addition, the Permittee shall only change those settings that are permitted by the manufacturer. The Permittee shall also meet the requirements of 40 CFR 89, 94 and/or 1068 as they apply. These records shall be maintained in a format suitable for inspection or submittal to the Division upon request.
[40 CFR 60.4211(a)]

7.12 The Permittee shall maintain monthly records of the operation of the emergency fire pump engine (FE) in non-emergency service that are recorded through the non-resettable hour meter required in Condition 5.3. The Permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. These records shall be maintained in a format suitable for inspection or submittal to the Division upon request.
[40 CFR 60.4214(b) and 391-3-1-.02(6)(b)1]

7.13 For each shipment of diesel fuel oil received for use in the fire pump engine (FE), the Permittee shall obtain from the supplier of the fuel oil, a statement certifying that the oil complies with the specifications of ultra-low sulfur diesel fuel oil contained in ASTM D975. As an alternative to the procedure described above, the Permittee may, for each shipment of diesel fuel oil received, obtain a sample for analysis of the sulfur content. The procedures of ASTM D4057 shall be used to acquire the sample. Sulfur content shall be determined using the procedures of Test Method ASTM D129 or by some other test method approved by the EPA and acceptable to the Division. These records shall be maintained in a format suitable for inspection or submittal to the Division upon request.
[391-3-1-.02(6)(b)1]

7.14 The Permittee shall notify the Division in writing within 15 days of commencing construction of the sawmill, three continuous drying kilns, the planer mill, the emergency fire pump engine and the diesel and gasoline storage tanks. The notification should document what activities constituting "commencing construction" have been performed and the date on which they occurred.
[391-3-1-.03(2)(c)]

8. Special Conditions

8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
[391-3-1-.03(2)(c)]

8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."
[391-3-1-.03(2)(c)]

8.3 The Permittee shall submit a completed Part 70 Operating Permit application to the Division electronically using GEOS within 12 months after startup of operations of the Albany Lumber mill.
[391-3-1-.03(2)(c)]

Attachment A: Equipment Listing

		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
CDK1	Drying Kiln No. 1 Direct-fired / Continuous Fuel Type = Natural Gas Capacity = 120 MMbf/yr NG Burner 40 MMBTU/hr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 40 CFR 52.21(j) 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2. 391-3-1-.02(2)(n)	2.1, 2.4, 2.5,2.6, 2.13, 2.14, 2.15, 3.1, 3.2, 4.2, 5.2, 7.1, 7.2,7.5, 7.6, 7.7, 7.8, 7.9, 7.14, 7.15	N/A	None
CDK2	Drying Kiln No. 2 Direct-fired / Continuous Fuel Type = Natural Gas Capacity = 120 MMbf/yr NG Burner 40 MMBTU/hr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 40 CFR 52.21(j) 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2. 391-3-1-.02(2)(n)	2.1, 2.4, 2.5,2.6, 2.13, 2.14, 2.15, 3.1, 3.2, 4.2, 5.2, 7.1, 7.2,7.5, 7.6, 7.7, 7.8, 7.9, 7.14, 7.15	N/A	None
CDK3	Drying Kiln No. 3 Direct-fired / Continuous Fuel Type = Natural Gas Capacity = 120 MMbf/yr NG Burner 40 MMBTU/hr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 40 CFR 52.21(j) 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2. 391-3-1-.02(2)(n)	2.1, 2.4, 2.5,2.6, 2.13, 2.14, 2.15, 3.1, 3.2, 4.2, 5.2, 7.1, 7.2,7.5, 7.6, 7.7, 7.8, 7.9, 7.14, 7.15		
PM	Planer Mill 360 MMBF/yr	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(n)	2.1, 2.4, 2.5, 2..13, 2.14, 3.1, 3.2, 4.1, 7.1, 7.4, 7.14, 7.15	PMC	Planer Mill Shavings Cyclofilter
FE	Emergency Fire Pump Engine	40 CFR 60 Subpart IIII 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b)1.	2.2, 2.4, 2.5, 2.7, 2.8, 2.9, 2.10, 2.11, 2.12, 2.13, 5.3, 7.1, 7.3, 7.10, 7.11, 7.12, 7.13, 7.14, 7.15	N/A	None
T1	Large Diesel Storage Tank 10,000 gallon	391-3-1-.02(2)(b)1.	2.3**,** 2.4, 2.5, 7.1, 7.14, 7.15	N/A	None
T2	Gasoline Storage Tank 1000 gallon	391-3-1-.02(2)(b)1.	2.3**,** 2.4, 2.5, 7.1, 7.14, 7.15	N/A	None